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November 1, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*  
*E911 Quarterly Report – CC Docket No. 94-102*

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.<sup>1</sup>

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin  
Lee J. Rosen

Attachment

cc: Kris Monteith, Acting Chief, Enforcement Bureau  
Catherine W. Seidel, Acting Chief, Wireless Telecommunications Bureau  
Tim Ryan, Acting Executive Director, APCO  
Rob Martin, Executive Director, NENA  
James R. Hobson, Counsel for NENA and NASNA  
Steve Marzolf, President, NASNA

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

## **E911 Status – Quarterly Report**

**CC Docket No. 94-102**

**November 1, 2005**

### **Summary of Report**

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,<sup>1</sup> Dobson Cellular Systems, Inc.,<sup>2</sup> as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

### **Phase I Service**

DCS has received numerous requests for Phase I services and has activated service in all but a few of these jurisdictions. DCS has worked diligently with its third-party vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. DCS remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in the remaining jurisdictions as soon as possible. As previously disclosed, on June 15, 2004, DCS completed the acquisition of NPI-Omnipoint Wireless, LLC ("NPI"). In the process, DCS acquired two outstanding Phase I E911 deployment requests, both of which have been completed.

### **Phase II Service**

#### **A. Deployment Preparation**

DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. DCS relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. DCS has worked with equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services have been completed.

DCS has executed a contract with Andrew Corporation to provide the Position Determining Entity equipment necessary to deploy a Phase II network-based location solution. DCS has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II. DCS considers a market as being E911 Phase II "deployed" after DCS has completed testing of the installed hardware and software with the PSAP to confirm that the PSAP is receiving latitude and longitude information in the appropriate format.

#### **B. Phase II Requests**

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

<sup>2</sup> The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

During the past quarter, DCS has deployed the necessary software and hardware of the network-based Phase II solution in response to pending requests. DCS received no new Phase II requests since the last quarterly filing. The status of all requests is detailed in the attachment. On June 22, 2005, DCS completed the acquisition of licenses previously held by RFB Cellular, Inc. Debtor-in-Possession and Alpine-Michigan F, LLC Debtor-in-Possession (collectively “RFB”).<sup>3</sup> In the process, DCS became subject to various Phase II E911 deployment requests, all of which had been generally satisfied utilizing a CDMA technology. Dobson has completed a GSM overlay of the RFB network in areas not otherwise covered by Dobson’s previously-licensed spectrum, but this GSM network is operating through a different switch located in Grand Traverse, MI. As a result, Dobson currently is completing deployment of the necessary software and hardware for both Phase I and Phase II technology on the GSM network-based solution in these markets.

To ensure that it may properly prioritize its E911-designated resources, DCS has generally requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.<sup>4</sup> Although DCS has not yet received a response to its request from all of these PSAPs, it is proceeding in good faith and has signed a contract with Andrew Corporation and Polaris Wireless to provide Phase II capabilities in all DCS counties.

### **C. Deployment Issues**

DCS, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information. DCS has recently employed a software based solution from Polaris in the vast majority of its markets that DCS hopes will ultimately yield more reliable results in these difficult markets. However, DCS may not be able to provide accuracy results that satisfy the Commission’s current view of its Phase II requirements due to cell site configuration problems, especially in markets with only one or two cell sites. Moreover, since the filing of the last quarterly report, DCS has learned from the vendor that E911 Phase II service will not be available to subscribers using analog service in the Polaris-served markets. DCS is currently reviewing other alternatives to provide E911 Phase II to these subscribers.

For DCS’s hardware-based solution, in order to meet the Commission’s network-based accuracy requirements, Andrew Corporation may need to install Angle-of-Arrival (“AOA”) antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS brought similar matters to the Commission’s attention in its original waiver request.<sup>5</sup> Accordingly, if necessary, DCS may avail itself of further waiver procedures to

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<sup>3</sup> In acquiring the RFB markets, DCS was not provided the specific dates of all previously received PSAP requests and, if applicable, E911 deployment dates. In the absence of having a specific date to insert into the report, DCS utilizes the placeholder date of 12/28/04 (the date DCS acquired the assets in RFB markets) to comply with formatting issues previously raised by the FCC staff.

<sup>4</sup> *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

<sup>5</sup> See DCS Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission’s Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.<sup>6</sup>

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

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<sup>6</sup> See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
10	Anchorage Police Department	AK	Anchorage Borough	1	TDMA/GSM	04/28/2004		N	Y	08/17/2005			Dobson encountered LEC delays, but worked with the LEC to secure a contract in order to complete final SS7 connectivity. Having resolved the contract issue, Dobson began deployment and realized that it did not have the necessary connectivity in place for its GSM network. The necessary trunks were ordered from the LEC on July 25, 2005. Dobson received the trunks in August 2005 and deployed shortly after receipt.
10	Anchorage Police Department	AK	Anchorage Borough	2	TDMA/GSM	04/28/2004		N	Y	10/28/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
3429	Kalkaska County Central Dispatch	MI	Kalkaska	1	TDMA/GSM	04/30/2001		N	Y	04/08/2002			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	2	TDMA/GSM	10/01/2004		N	Y	04/25/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 8, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3459	Mason-oceana 9-1-1-Mason	MI	Mason	1	GSM	02/09/2001		N	Y	08/19/2002			
3459	Mason-Oceana 9-1-1-Mason	MI	Mason	2	GSM	1/9/03 and 9/30/2003		N	Y	04/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 6, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3454	Manistee County Central Dispatch	MI	Manistee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	2	TDMA/GSM	07/21/2005		N	Y	09/15/2005			
3493	Montmorency County Sheriffs Department	MI	Montmorency	1	GSM	06/22/2005		N	Y	10/28/2005			Dobson acquired this license on June 22, 2005, however, the predecessor-in-interest did not provide the original PSAP request so the actual request date is unknown.
3493	Montmorency County Sheriffs Department	MI	Montmorency	2	GSM	06/22/2005		N	Y	10/28/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Dobson acquired this license on June 22, 2005, however, the predecessor-in-interest did not provide the original PSAP request so the actual request date is unknown.
3518	Oscoda County Sheriffs Department	MI	Oscoda	1	GSM	06/22/2005		N	N		TBD	1, 4	Dobson is waiting on the necessary facilities to be deployed for Phase I and will install shortly after receipt. Dobson acquired this license on June 22, 2005, however, the predecessor-in-interest did not provide the original PSAP request so the actual request date is unknown.
3518	Oscoda County Sheriffs Department	MI	Oscoda	2	GSM	06/22/2005		N	N		TBD	1, 4	See Oscoda County Phase I. Dobson is waiting on the necessary LEC facilities to be deployed for Phase I and will install Phase II following deployment of Phase I. Dobson acquired this license on June 22, 2005, however, the predecessor-in-interest did not provide the original PSAP so the actual request date is unknown.
3517	Osceola County Sheriffs Office	MI	Osceola	1	TDMA/GSM	09/01/2000		N	Y	04/25/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3517	Osceola County Sheriffs Office	MI	Osceola	2	TDMA/GSM	06/15/2004		N	Y	04/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on June 2, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	2	TDMA/GSM	10/23/2003		N	Y	04/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on June 1, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3316	Antrim County Central Dispatch	MI	Antrim	1	TDMA/GSM	09/11/2001		Y	Y	10/13/2003			
3316	Antrim County Central Dispatch	MI	Antrim	2	TDMA/GSM	12/20/2004		N	Y	04/27/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution on or about April 27, 2005. Through its third-party vendor Intrado, Dobson tested on July 26, 2005 to demonstrate to the PSAP that latitude and longitude information was being transmitted in the appropriate format.
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	1	TDMA/GSM	09/01/2000		N	Y	04/08/2002			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/26/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution on or about April 26, 2005. Through its third-party vendor Intrado, Dobson completed testing on July 8, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3442	Leelanau County Sheriffs Department	MI	Leelanau	1	TDMA/GSM	02/15/2001		N	Y	03/18/2002			
3442	Leelanau County Sheriffs Department	MI	Leelanau	2	TDMA/GSM	1/29/2004 and 6/15/04		N	Y	04/25/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 12, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3587	Wexford County Central Dispatch	MI	Wexford	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3587	Wexford County Central Dispatch	MI	Wexford	2	TDMA/GSM	06/10/2005		N	Y	07/12/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
3346	CCE Central Dispatch-Emmet	MI	Emmet	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	2	TDMA/GSM	12/3/2003 and 6/15/04		N	Y	04/27/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution on or about April 27, 2005. Through its third-party vendor Intrado, Dobson completed testing on July 26, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3330	Benzie County Sheriffs Department	MI	Benzie	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3330	Benzie County Sheriffs Department	MI	Benzie	2	TDMA/GSM	03/17/2005		N	Y	04/25/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 6, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	2	TDMA/GSM	06/06/2005		N	Y	07/22/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
3415	Huron County Central Dispatch	MI	Huron	1	TDMA/GSM	09/01/2000		N	Y	02/15/2002			
3415	Huron County Central Dispatch	MI	Huron	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 14, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3550	Sanilac County Central Dispatch	MI	Sanilac	1	TDMA/GSM	09/01/2000		N	Y	02/22/2002			
3550	Sanilac County Central Dispatch	MI	Sanilac	2	TDMA/GSM	11/03/2003		N	Y	04/27/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 13, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3572	Tuscola County Central Dispatch	MI	Tuscola	1	TDMA/GSM	09/01/2000		N	Y	02/13/2002			
3572	Tuscola County Central Dispatch	MI	Tuscola	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	1	GSM	09/01/2000		N	Y	05/26/2004			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	2	GSM	12/03/2003		N	Y	04/27/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution on or about April 27, 2005. Through its third-party vendor Intrado, Dobson completed testing on August 1, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3308	Alcona County Sheriffs Department	MI	Alcona	2	GSM	11/01/2003		N	Y	04/22/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on June 13, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3317	Arenac County Central Dispatch	MI	Arenac	2	GSM	10/31/2003		N	Y	08/08/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution on or about April 22, 2005. Subsequently, Dobson encountered technical difficulties at certain cell sites, as a result of which the PSAP is not able to receive location information from Dobson coverage areas served by these cell sites. PSAP requested that Dobson revert back to Phase I and Dobson has worked to resolve these issues. On July 19, 2005, Dobson contacted PSAP after resolving problems and through its third-party vendor Intrado, Dobson completed testing on August 8, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3354	Clare County Central Dispatch	MI	Clare	2	GSM	03/03/2004		N	Y	04/21/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 8, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3361	Crawford Emergency Central Dispatch	MI	Crawford	2	GSM	10/23/2003		N	Y	04/27/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 6, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3420	Iosco County 9-1-1	MI	Iosco	2	GSM	08/18/2003		N	Y	04/22/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on June 10, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. Although Dobson has completed deployment of Phase II service, PSAP has requested that Dobson revert back to Phase I until such time as accuracy can be improved. Dobson has complied with the PSAP request.
3423	Isabella County Central Dispatch	MI	Isabella	2	GSM	04/21/2004		N	Y	04/20/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 7, 2005 to demonstrate to the PSAP that latitude and longitude information was being transmitted in the appropriate format. Although Dobson completed deployment of Phase II service, on July 8, 2005, Dobson reverted back to Phase I per PSAP request.
3451	Mackinac County Sheriffs Department	MI	Mackinac	1	GSM	02/15/2001		N	Y	02/02/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3451	Mackinac County Sheriffs Department	MI	Mackinac	2	GSM	02/03/2004		N	Y	04/27/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 7, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3461	Meceola Central Dispatch-Mecosta	MI	Mecosta	2	GSM	04/01/2004		N	Y	04/20/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 15, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3542	Roscommon County Central Dispatch	MI	Roscommon	2	GSM	10/28/2003		N	Y	04/21/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 27, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. Although Dobson has completed deployment of Phase II service, on July 29, 2005, Dobson reverted back to Phase I per PSAP request.
3495	Muskegon Central Dispatch	MI	Muskegon	2	GSM	10/13/2004		N	Y	04/20/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 6, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3504	Newaygo County 9-1-1 Central Dispatch	MI	Newaygo	2	GSM	10/21/2003		N	Y	04/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on June 3, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3482	Midland County Central Dispatch	MI	Midland	1	GSM	08/16/2000		N	Y	05/26/2005			
3482	Midland County Central Dispatch	MI	Midland	2	GSM	01/27/2004		N	Y	06/15/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson has completed testing to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3313	Alpena County Central Dispatch	MI	Alpena	1	GSM	11/16/2004		N	Y	01/12/2005			
3313	Alpena County Central Dispatch	MI	Alpena	2	GSM	11/09/2004		N	Y	04/26/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 8, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3515	Ogemaw County Sheriffs Department	MI	Ogemaw	2	GSM	01/28/2004		N	Y	09/15/2005			PSAP communicated that it will not be ready to receive Phase II information until December 1, 2005. Dobson will coordinate with PSAP once PSAP indicates its Phase II readiness.
3519	Otsego County 9-1-1	MI	Otsego	2	GSM	11/21/2003		N	Y	04/26/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson re-scheduled and completed testing on July 28, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3492	Montcalm County Central Dispatch	MI	Montcalm	2	GSM	11/05/2004		N	Y	04/20/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing on July 6, 2005 to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format.
3309	Alger County Central Dispatch	MI	Alger	1	GSM	01/25/2005		N	Y	09/22/2005			Dobson had difficulties establishing the necessary connectivity with the LEC. Dobson ordered the necessary facilities, but the LEC was unable to provide enough trunk lines. Subsequently, the LEC established additional connectivity and capacity through a fiber optic project and Dobson deployed with the newly established trunks soon thereafter.
3309	Alger County Central Dispatch	MI	Alger	2	GSM	01/25/2005		N	Y	09/22/2005			See Alger County Phase I. Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing to demonstrate to the PSAP that lat and long information was being transmitted in the appropriate format.
3309	Alger County Central Dispatch	MI	Alger	2	CDMA	01/25/2005		N	Y	07/28/2005			
3352	Chippewa County Central Dispatch	MI	Chippewa	1	GSM	12/28/2004		N	Y	09/22/2005			See Alger County Phase I.
3352	Chippewa County Central Dispatch	MI	Chippewa	2	GSM	11/03/2003		N	Y	09/22/2005			See Alger County GSM Phase II.
3352	Chippewa County Central Dispatch	MI	Chippewa	2	CDMA	11/03/2003		N	Y	09/16/2004			
3449	Luce County Sheriffs Department	MI	Luce	1	GSM	12/28/2004		N	Y	09/23/2005			See Alger County Phase I.
3449	Luce County Sheriffs Department	MI	Luce	2	GSM	12/30/2003		N	Y	09/23/2005			See Alger County GSM Phase II.
3449	Luce County Sheriffs Department	MI	Luce	2	CDMA	12/30/2003		N	Y	09/16/2004			
3365	Delta County Central Dispatch	MI	Delta	1	GSM	12/28/2004		N	Y	09/22/2005			See Alger County Phase I.
3365	Delta County Central Dispatch	MI	Delta	2	GSM	01/20/2004		N	Y	09/22/2005			See Alger County GSM Phase II.
3365	Delta County Central Dispatch	MI	Delta	2	CDMA	01/20/2004		N	Y	12/28/2004			
3552	Schoolcraft County	MI	Schoolcraft	1	GSM	12/28/2004		N	Y	09/23/2005			See Alger County Phase I.
3365	Schoolcraft County	MI	Schoolcraft	2	GSM	12/28/2004		N	Y	09/23/2005			See Alger County GSM Phase II.
3365	Schoolcraft County	MI	Schoolcraft	2	CDMA	12/28/2004		N	Y	12/28/2004			
3531	Presque Isle Sheriffs Department	MI	Presque Isle	2	GSM	06/14/2005		N	Y	08/01/2005			
3763	Caldwell County Sheriffs Office	MO	Caldwell	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			

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3763	Caldwell County Sheriffs Office	MO	Caldwell	2	TDMA/GSM	10/25/2004		N	N		TBD	2, 4	Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson has tested to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. PSAP CPE equipment is not functioning properly and Dobson will work with PSAP and finalize deployment once PSAP's vendor completes software upgrade. PSAP has agreed in writing to Dobson's alternative deployment schedule.
3785	Clinton County Sheriffs Office	MO	Clinton	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3785	Clinton County Sheriffs Office	MO	Clinton	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson is scheduling testing to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. Dobson has been in contact with PSAP to establish testing date. PSAP has agreed in writing to Dobson's alternative deployment schedule.
3795	De Kalb County Sheriffs Office	MO	De Kalb	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3795	De Kalb County Sheriffs Office	MO	De Kalb	2	TDMA/GSM	10/25/2004		N	Y	09/19/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson is scheduling testing to demonstrate to the PSAP that latitude and longitude information is being transmitted in the appropriate format. Dobson has been in contact with PSAP to establish testing date. PSAP has agreed in writing to Dobson's alternative deployment schedule.
3860	Maryville Police Department	MO	Nodaway	1	TDMA/GSM	08/27/2003		N	Y	08/23/2004			
3860	Maryville Police Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	N		11/30/2005	2	The original request was sent on October 1, 2004 to a former Dobson employee. Finally receiving the letter on July 20, 2005, Dobson now treats the request as valid. PSAP CPE equipment is not functioning properly and Dobson will deploy once PSAP's vendor completes software upgrade.
3879	Nodaway County Sheriffs Department	MO	Nodaway	1	TDMA/GSM	01/21/2004		N	Y	08/23/2004			
3879	Nodaway County Sheriffs Department	MO	Nodaway	2	TDMA/GSM	07/20/2005		N	Y	09/26/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
3769	Carroll County Sheriffs Office	MO	Carroll	1	TDMA/GSM	07/29/2004		N	Y	07/15/2005			Dobson worked with the LEC and has resolved information delivery issues to complete deployment.
3769	Carroll County Sheriffs Office	MO	Carroll	2	TDMA/GSM	07/29/2004		N	Y	09/26/2005			Having resolved LEC issues for Phase I, Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing to demonstrate that latitude and longitude information is being transmitted in the appropriate format.
3811	Gentry County 9-1-1	MO	Gentry	1	TDMA/GSM	04/04/2005		N	N		TBD	1	Dobson has not received the necessary LEC facilities and will install the circuits and turn on Phase I once they arrive. The PSAP has been informed in writing of these LEC issues.
3742	Atchison County 9-1-1	MO	Atchison	1	TDMA/GSM	06/14/2005		N	N		12/14/2005		

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2707	Brown County Sheriffs Office	KS	Brown	1	TDMA/GSM	03/30/2005		N	N		TBD	1	Dobson has not received the necessary LEC facilities and will install the circuits and turn on Phase I once they arrive. The PSAP has been informed in writing of these LEC issues.
6423	Bastrop County Sheriffs Office	TX	Bastrop	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6467	Caldwell County Sheriffs Office	TX	Caldwell	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6578	Fayette County Sheriffs Office	TX	Fayette	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6725	Lee County Sheriffs Office	TX	Lee	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6674	Jackson County Sheriffs Office	TX	Jackson	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6722	Lavaca County Sheriffs Office	TX	Lavaca	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6865	Rockdale Police Department	TX	Milam	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6627	Hamilton County Sheriffs Office	TX	Hamilton	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6575	Falls County Sheriffs Office	TX	Falls	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6587	Freestone Sheriffs Office	TX	Freestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6733	Limestone Sheriffs Office	TX	Limestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6446	Bosque County Sheriffs Office	TX	Bosque	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6649	Hill County Sheriffs Office	TX	Hill	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6498	Colorado County Sheriffs Office	TX	Colorado	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6592	Ft Bend County Sheriffs Office	TX	Fort Bend	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6757	Matagorda County Sheriffs Office	TX	Matagorda	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6993	Wharton County Sheriffs Office	TX	Wharton	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	2	TDMA/GSM	3/9/2005		N	Y	09/14/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
6572	Erath County Sheriffs Office	TX	Erath	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6572	Erath County Sheriffs Office	TX	Erath	2	TDMA/GSM	3/9/2005		N	Y	09/21/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
6411	Armstrong County Sheriffs Office	TX	Armstrong	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6476	Carson County Sheriffs Office	TX	Carson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6496	Collingsworth County Sheriffs Office	TX	Collingsworth	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6547	Donley County Sheriffs Office	TX	Donley	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6817	Pampa Police Department	TX	Gray	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6628	Hansford County Sheriffs Office	TX	Hansford	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6640	Hemphill County Sheriffs Office	TX	Hemphill	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6445	Borger Police Department	TX	Hutchinson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6735	Lipscomb County Sheriffs Office	TX	Lipscomb	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6827	Perryton Police Department	TX	Ochiltree	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6861	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6995	Wheeler County Sheriffs Office	TX	Wheeler	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6862	Robertson County Sheriff	TX	Robertson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6464	Burleson County Sheriffs Office	TX	Burleson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6726	Leon Sheriffs Office	TX	Leon	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6978	Washington County Sheriffs Department	TX	Washington	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6402	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Comanche County Sheriffs Office	TX	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sheriffs Office	TX	Runnels	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	Y	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/28/2003		N	Y	01/27/2005			Dobson is continuing to work with the PSAP to develop additional sites and improve accuracy.
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N	Y	08/13/2003			
6641	Henderson County Sheriffs Department	TX	Henderson	2	TDMA/GSM	07/29/2003		N	Y	12/10/2004			
6911	Somervell County Sheriffs Department	TX	Somervell	2	TDMA/GSM	03/09/2005		N	Y	09/21/2005			Dobson completed installation of the necessary software and hardware of the network-based E911 Phase II solution.
3205	Allegany County Emergency Services	MD	Allegany	1	TDMA	11/21/2003		N	Y	09/22/2004			
3205	Allegany County Emergency Services	MD	Allegany	1	GSM	11/21/2003		N	Y	06/21/2005			

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3205	Allegany County Emergency Services	MD	Allegany	2	TDMA/GSM	10/18/2004		N	Y	07/26/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution. Through its third-party vendor Intrado, Dobson completed testing to demonstrate to the PSAP that lat/long information is being transmitted in the appropriate format.
3236	Washington County Fire Rescue and Com	MD	Washington	1	TDMA/GSM	01/30/2004		N	Y	01/11/2005			
3236	Washington County Fire Rescue and Com	MD	Washington	2	TDMA/GSM	02/07/2005		N	Y	07/13/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
3223	Garrett County Fire and Rescue Commun	MD	Garrett	1	TDMA/GSM	05/05/2004		N	Y	01/18/2005			
3223	Garrett County Fire and Rescue Commun	MD	Garrett	2	TDMA/GSM	01/21/2005		N	Y	06/29/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
3220	Frederick County Emergency Communicat	MD	Frederick	1	TDMA/GSM	06/03/2004		N	Y	10/20/2005			Dobson had difficulty in establishing trunks to the selective router. Due to the distance to the selective router, Dobson processed its order through the interexchange carrier ("IXC"), who in turn processed the order through the LEC. Dobson ended up working around the IXC and through the LEC to process the facilities orders and completed Phase I deployment.
3220	Frederick County Emergency Communicat	MD	Frederick	2	TDMA/GSM	06/15/2004		N	Y	10/20/2005			See Phase 1 note (Frederick County 3220). Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5887	Erie County 9-1-1 Center	PA	Erie	1	TDMA/GSM	04/12/2001		N	Y	02/06/2002			
5887	Erie County 9-1-1 Center	PA	Erie	2	TDMA	04/12/2001		N	Y	10/30/2003			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5887	Erie County 9-1-1 Center	PA	Erie	2	GSM	04/12/2001		N	Y	09/07/2005			Dobson has completed installation of the necessary software and hardware of the network-based E911 Phase II solution. Dobson has encountered technical issues and equipment malfunctions at certain cell sites, as a result of which the PSAP is not able to receive location information from Dobson coverage areas served by these cell sites. Dobson continues to work to resolve these issues.
5878	Crawford County Office of Emergency Serv	PA	Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Y	03/26/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	2	TDMA	06/13/2003		N	Y	04/01/2004			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5031	Allegany County Sheriffs Office	NY	Allegany	2	GSM	06/13/2003		N	Y	05/25/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Y	08/06/2002			
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA	06/05/2002		N	Y	04/15/2004			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	GSM	06/05/2002		N	Y	05/13/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	1	TDMA/GSM	06/01/2001		N	Y	05/17/2002			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	TDMA	12/13/2002		N	Y	04/20/2004			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	GSM	12/13/2002		N	Y	05/12/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5084	Genesee County Sheriffs Office	NY	Genesee	1	TDMA/GSM	04/10/2001		N	Y	11/21/2002			

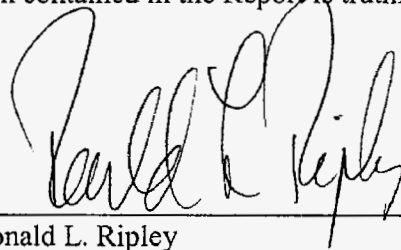
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA	09/09/2002		N	Y	11/13/2003			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5084	Genesee County Sheriffs Office	NY	Genesee	2	GSM	09/09/2002		N	Y	05/25/2005			Dobson has completed deployment of the necessary software and hardware of the network-based E911 Phase II solution.
5208	Steuben County Sheriffs Office	NY	Steuben	1	TDMA/GSM	11/03/2004		N	N	10/26/2005			ACC had difficulties establishing connectivity with the LEC. ACC has placed its order with the interexchange carrier ("IXC") due to the distance to the selective router. In turn, the IXC obtained the necessary cooperation with the LEC to process the trunks. ACC deployed Phase I shortly after the trunks arrived.
5208	Steuben County Sheriffs Office	NY	Steuben	2	TDMA/GSM	11/03/2004		N	N	10/26/2005			See Phase I for Steuben County above.
5608	Chickasha Police Department	OK	Grady	1	TDMA/GSM	9/15/2004		N	Y	3/10/2005			
5608	Chickasha Police Department	OK	Grady	2	TDMA/GSM	3/10/2005		N	Y	8/18/2005			Dobson is scheduling deployment of the necessary software and hardware of the network-based E911 Phase II solution.

**AFFIDAVIT OF RONALD L. RIPLEY**

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley  
Senior Vice President &  
General Counsel

Executed on:

November 1, 2005

### **CERTIFICATE OF SERVICE**

I, LaVon E. Nickens, hereby certify that on the 1<sup>st</sup> day of November 2005, copies of the foregoing "E911 Quarterly Report" have been served by first class mail, postage prepaid to the following:

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/s/ LaVon E. Nickens  
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